

RESPONSE TO THE ISSUES RAISED
IN THE PUBLIC CONSULTATION PROGRAM
OCTOBER TO NOVEMBER 1989

December 5, 1989.

HIGHLIGHTS

1.0 BACKGROUND

The Chairmen of the five Regional governments in the Greater Toronto Area -- Durham, Halton, Metropolitan Toronto, Peel and York -- have agreed to explore a joint approach to solving the area's solid waste problems. The Regions have formed the Solid Waste Interim Steering Committee (SWISC), to coordinate the search for a waste management system for the Greater Toronto Area (GTA). The LURA Group has been retained by SWISC to develop and implement a Public Consultation Program as part of this process.

During the months of October and November 1989, the Solid Waste Interim Steering Committee initiated a round of public consultations to receive input on the Request for Expressions of Interest (REOI). The purpose of the REOI is to request prospective respondents (from the private and/or public sectors) to propose comprehensive waste management systems or components of systems to manage waste generated in the Greater Toronto Area (GTA). The Chairmen's Principles for waste management as set out in the REOI are designed as a guide for respondents. Public consultations were held with citizens and interest groups within the GTA to obtain comment and input into the Chairmen's Principles.

The Chairmen propose to evaluate responses to the REOI, as well as systems proposed in regional waste management master plans, and any other relevant technologies. Once this evaluation is conducted, a draft Request for Proposals (RFP) will be prepared. The RFP will describe details of the preferred system(s). The draft RFP will be subject to the review and input of the five member regional governments, interested citizens and the general public. When finalized, the RFP will be forwarded to respondents who incorporated elements of the preferred system in their Expressions of Interest.

Within the overall context of the SWISC Public Consultation Program, the initial consultations conducted by SWISC will be followed by more intensive deliberations on the preferred waste management system(s). This program, which will include the public at each phase of the SWISC process, is being developed in consultation with interest groups and regional waste management master plan committees.

On November 17, SWISC's public consultation consultants, The LURA Group, prepared a report entitled *Report of the SWISC Public Consultation Program, October to November 1989*, which documents and summarizes the results of the first phase of the Public Consultation Program. SWISC subsequently prepared this *Response to the Issues Raised in the Public Consultation Program, October to November, 1989*. It is intended to clarify the meaning of the Chairmen's Principles and address issues raised during this phase of the Public Consultation Program.

Some of these issues have not been explicitly addressed previously by SWISC. Actions to be taken by SWISC in response to these key issues are described below.

2.0 ACTION ITEMS

2.1 Actions to achieve provincial targets for the diversion of solid wastes from waste disposal:

In recognition of the urgent need for the five Regional governments to implement aggressive waste reduction, reuse, recycling and materials recovery programs, SWISC members are taking the following actions:

2.1.1. All Regional governments will continue to aggressively pursue strategies for achieving and accelerating maximum waste diversion through reduction, re-use, recycling and material recovery, and collectively with the Province will pursue educational programs, and means to protect and enhance markets for end products.

2.1.2. The result will be an accelerated program to achieve or exceed diversion targets established to meet the principles of SWISC. Regional staff will report back to SWISC's Technical Committee by the end of January 1990.

2.1.3. A SWISC Strategy and Action Plan for Waste Diversion will then be developed. It will incorporate programs to be implemented jointly by member regions, focusing on immediate, mid-term and long-term actions to achieve and/or exceed SWISC targets.

2.1.4. SWISC will ask the province to renew its commitment to facilitate and support these activities, including undertaking measures to ensure market availability of diverted material.

The following initiatives will be addressed and incorporated in the Strategy and Action Plan for Waste Diversion:

- * A major education program for the general public and the industrial/commercial/institutional sectors to achieve maximum resource diversion. This major education program will include public participation to ensure personal responsibility to minimize waste generation.
- * Actions to promote legislative measures where appropriate to be taken at all levels of government to achieve waste reduction and resource diversion.

To facilitate the development of this strategy, SWISC has retained consultants to assist in coordinating regional collaboration.

2.2. Commitment to the 3 Rs waste management hierarchy

2.2.1. SWISC endorses the 3 Rs hierarchy of reduction, re-use, and recycling.

2.2.2. Priority and preference will be given to proposals which promote this hierarchy. This priority will be clearly respected in the development of a preferred waste management system.

2.2.3. An explicit recognition of this hierarchy and its importance, will be contained in SWISC's Request for Proposals, and will be used as a basis for evaluating the RFPs.

2.3 The need for waste reduction targets

2.3.1 SWISC believes that targets for waste reduction are necessary. The provincial and federal governments are requested to advise SWISC of their policies, proposed targets and proposed programs to achieve these targets by June 30, 1990.

3.0. RESPONSES TO SPECIFIC ISSUES

SWISC has addressed numerous additional issues in its "Response". These include:

- * the need to ensure monitoring and enforcement of waste diversion targets;
- * preference is to be given to those proposals which can achieve significant waste diversion at an early date;
- * the need to ensure markets for recovered resources;
- * the Environmental Assessment and Environmental Protection acts will be complied with to ensure environmentally acceptable methods for waste management are implemented for the long-term waste management system;
- * confirmation that the waste management system(s) to be selected must meet the SWISC waste diversion targets of 25% by 1992 and 50% by the year 2000;
- * clarification that the "costs" of the system will include the real costs of waste management, i.e. social, environmental, technical and financial costs from cradle to grave, including perpetual care;
- * incorporation of many suggestions regarding the scope and framework for Research and Development facilities;
- * clarification that "receptive communities" are those where the level of government responsible for waste disposal formally indicates that it agrees with a proposal(s) in principle, subject to its approval under the Environmental Assessment and Environmental Protection Acts;
- * a criterion will be added to ensure that any new industrial development in receptive communities is acceptable and environmentally sound;
- * confirmation that SWISC is committed to public control of a long-term waste management system for the Greater Toronto Area;

- * confirmation that SWISC will continue its practice of using recycled paper for all its printed materials; and
- * confirmation that it is the intention that contingency sites not be used after 1996.

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1.0 BACKGROUND

The Chairmen of the five Regional governments in the Greater Toronto Area -- Durham, Halton, Metropolitan Toronto, Peel and York -- have agreed to explore a joint approach to solving the area's solid waste problems. The Regions have formed the Solid Waste Interim Steering Committee (SWISC), to coordinate the search for a waste management system for the Greater Toronto Area (GTA). The LURA Group has been retained by SWISC to develop and implement a Public Consultation Program as part of this process.

During the months of October and November, 1989, the Solid Waste Interim Steering Committee initiated a round of public consultations to receive input on the Request for Expressions of Interest (REOI). The purpose of the REOI is to request prospective respondents (from the private and/or public sectors) to propose comprehensive waste management systems or components of systems to manage waste generated in the Greater Toronto Area. The Chairmen's Principles for waste management, as set out in the REOI, are designed as a guide for respondents. Public consultations were held with citizens and interest groups within the GTA to obtain comment and input into the Chairmen's Principles.

The Chairmen propose to evaluate responses to the REOI, as well as systems proposed in regional waste management master plans, and any other relevant technologies. Once this evaluation is conducted, a draft Request for Proposals (RFP) will be prepared. The RFP will describe details of the preferred system(s). The draft RFP will be subject to the review and input of the five member regional governments, interested citizens and the general public. When finalized, the RFP will be forwarded to respondents who incorporated elements of the preferred system in their Expressions of Interest.

1.1 INTRODUCTION

SWISC has developed Principles which it has proposed be used as a basis for criteria to evaluate the responses to the REOI. The first stage of the Public Consultation Program undertaken by LURA Group was specifically designed to elicit input, feedback and comments on these Principles. The results of this program of public consultation program are contained in the *Report of the SWISC Public Consultation Program, October to November 1989*, released on November 17, 1989.

This document contains the responses by SWISC to the above record of issues raised during the public consultation process. For clarity, issues are listed according to the principle under which they were raised or to which they are related. It should be noted that each principle in the set of six must be considered in concert with the others, as a "set of principles".

Because of the short time-frame in which the initial round of public consultation took place, it is recognized that participants had little opportunity to prepare for the workshops conducted in October/November. In particular, few individuals had the opportunity to read the documents issued to date by SWISC. Many of the issues raised by participants in the public consultation program have been dealt with in other documents. Where this has been the case and where SWISC has previously made a formal statement on the issues raised, it is noted in the text. For this purpose, "Chairmen's Proposal" refers to *A Proposal from the Five Regional Chairmen in the Greater Toronto Area Regarding a Long-Term Plan for the Management of Solid Waste*, (March 14, 1989). "Status Report" refers to the *Status Report to Member Councils on the Long-Term Plan for the Management of Solid Waste in the Greater Toronto Area*, (August 1989). "REOI" refers to the *Request for Expressions of Interest for the Development of a Comprehensive Long-Term Solid Waste Management System for the Greater Toronto Area*, (October 1989). It is hoped that this document will be able to clarify many of the issues raised to date.

Some of the issues raised during the public consultation process have not been explicitly addressed previously by SWISC. Where this is the case, SWISC has addressed the issues in this document.

In summary, input to SWISC's principles obtained through the public consultation program has resulted in clarification of meaning, as well as the commitment to incorporate evaluation criteria into the Requests for Proposals. In SWISC's next *Status Report*, expected in February/March 1990, SWISC will update its approach to incorporate public input as articulated in this document.

2.0 RESPONSES TO CONCERNS ABOUT PRINCIPLE ONE

To aim at fulfilling provincial targets for diversion of solid wastes from disposal (25% by 1992 and 50% by 2000). Disposal of residual waste refers to landfill, energy from waste and other environmentally acceptable methods.

2.1 Comment:

- * The term "solid wastes" needs to be defined.

Response:

"Solid wastes" include all wastes, other than "liquid industrial waste" and hazardous wastes, as defined in Regulation 309.

Solid wastes are defined in the REOI as "any solid non-hazardous discarded material generated from households, commercial establishments and industry", (p. 11).

2.2 Comments:

- * Principle One (diversion of wastes from disposal) should be given top priority in the development of a waste management system.
- * Individuals (whether private citizens, commercial or industrial sectors) should take more responsibility for the solid waste they generate.
- * Educational programs are needed to support the above point.
- * There is a need for action, (whether it be taxation, legislation or something else), to deal with the issue of excess packaging of consumer products.

Response:

In recognition of the urgent need for the five Regional governments to implement aggressive waste reduction, reuse, recycling and material recovery programs, SWISC members are taking the following actions:

- 1) All Regional governments will continue to aggressively pursue strategies for achieving and accelerating maximum waste diversion through reduction, re-use, recycling and material recovery, and collectively with the Province will pursue educational programs, and means to protect and enhance markets for end products.

- 2) The result will be an accelerated program to achieve or exceed diversion targets established to meet the principles of SWISC. Regional staff will report back to Technical Committee by the end of January 1990.
- 3) A SWISC Strategy and Action Plan for Waste Diversion will be developed. It will incorporate programs to be implemented jointly by member regions, focusing on immediate, mid-term and long-term actions to achieve and/or exceed SWISC targets.
- 4) SWISC will ask the province to renew its commitment to facilitate and support these activities, including undertaking measures to ensure market availability for diverted materials (p. 20, Status Report; p. 6, Chairmen's Proposals).

The following initiatives will be addressed and incorporated in the Strategy and Action Plan for Waste Diversion:

- * A major education program for the general public and the industrial/commercial/institutional sectors to achieve maximum resource diversion (p.2, Chairmen's Proposals). This major education program will include public participation to ensure personal responsibility to minimize waste generation.
- * Actions to promote legislative measures where appropriate to be taken at all levels to achieve waste reduction and resource diversion (p. 4, Chairmen's proposals).

To facilitate the development of the strategy, SWISC has retained consultants to coordinate regional collaboration.

2.3 Comment:

- * An explicit hierarchy of the 3 Rs is needed.

Response:

SWISC is committed to and has directed its members to develop a strategy and implementation plan to achieve and/or exceed the 25% and 50% targets for diversion from disposal. These targets are to be achieved using the 3 Rs -- reduction, re-use and recycling, (REOI, p.8).

SWISC confirms this priority since every tonne of waste diverted is a tonne saved from utilizing valuable disposal capacity.

SWISC has previously documented this priority in the following manner:

- * SWISC aims to "view waste as a resource in the development and manufacturing of new products", (Chairmen's Proposal, p.1)

- * SWISC views waste as a "resource which should be recycled and re-used as many times as possible", Chairmen's Proposal, p. 4).
- * SWISC recognizes that "state-of-the-art recycling technology means that solid waste can now be considered -- and should be considered - - as a resource with positive economic value", (Chairmen's Proposal, p.6).
- * "The proposed waste management system will incorporate techniques for reduction, re-use, recycling and recovery to the greatest extent possible, with only residual waste going to landfill sites", (Chairmen's Proposal, p. 4).
- * SWISC has made a commitment to a "minimum landfill strategy", (Chairmen's Proposal, p. 7) and in the REOI evaluation criteria, (REOI, p. 66).
- * In the proposed criteria for evaluating responses to the REOI, preference is to be given to submissions which divert additional percentages of wastes from disposal, (REOI, p. 66).
- * A stated priority is given to "reduction" of wastes, (REOI, p. 66; Status Report, p. 15).
- * As members of the Recycling Council of Ontario, Regional governments in the Greater Toronto Area have already endorsed this hierarchy.

SWISC endorses the 3 Rs hierarchy of reduction, re-use, and recycling. Priority and preference will be given to proposals which promote this hierarchy. This priority will be clearly respected in the development of a preferred waste management system. An explicit recognition of this hierarchy, and its importance will be contained in SWISC's Request for Proposals, and it will be used as a basis for evaluating the RFPs.

2.4 Comment:

- * Targets set for diversion are not high enough.
- * Targets should be set for waste reduction.

Response:

SWISC believes that targets for waste reduction are necessary. The provincial and federal governments are requested to advise SWISC of their policies, proposed targets, and proposed programs to achieve these targets by June 20, 1990.

The Ministry of the Environment has set targets for diversion from disposal of 25% by 1992, and 50% by 2000. The targets which SWISC has set are to achieve or exceed waste materials diversion of 25% and 50% of total solid waste. This includes all solid wastes generated by domestic, commercial, industrial sectors.

Preference will be given to proposals which exceed targets, (REOI, p. 66). In addition, the Chairmen contemplate a bonus to Bidders at the RFP stage who exceed targets. (Chairmen's Proposal, p. vii).

2.5 Comment:

- * Monitoring of targets is required to ensure they are reached.

Response:

The monitoring for target achievement is a difficult area, since there is no simple standard monitoring system. The Ontario Ministry of the Environment will be developing guidelines and proposes a base year of 1987; SWISC uses 1989 waste generation rates prior to waste reduction, re-use and recycling as its baseline for targets in the REOI. Targets to achieve waste diversion are outlined in the REOI, and indicated in Table 4.2 of the REOI.

Respondents have been requested to propose monitoring frameworks in addition to monitoring by Regulatory agencies, (REOI, p.70).

Each Region is currently addressing plans to meet and/or exceed targets independently of SWISC.

2.6 Comment:

- * Preference should be given to proposals which can at an early date achieve significant diversion of waste from disposal.

Response:

SWISC concurs that time is of the essence, and that those waste diversion programs, systems and facilities which can achieve significant diversion will be given top priority in the evaluation process. Preference is given to submissions which can demonstrate that higher percentage diversions will be achieved earlier, (REOI, p.70).

2.7 Comment:

- * It is important to ensure that markets exist for diverted materials.

Response:

In addition to the provincial commitment to ensure markets (Status Report, p. 20), REOI respondents have been requested to provide details of the type of end products and marketability of these products, (REOI, pp 45 and 70).

SWISC is focusing on the question of markets, and it is considering the need for ensuring stable markets as part of the function of the agency proposed to manage the system.

Market development is also considered a desirable component of the proposed R&D facility(ies).

2.8 Comment:

- * Enforcement of targets for diversion from disposal are required.

Response:

SWISC contemplates performance-based contracts with successful bidders which would penalize or implement sanctions against a contractor who failed to meet specified recovery rates or targets.

The powers required of the proposed agency to ensure its authority to implement such penalties or sanctions are currently being examined.

In addition, a monitoring program as discussed earlier (section 1.5) is contemplated which will enable corrective measures to be taken quickly to ensure the achievement of targets.

2.9 Comment:

- * The term "environmentally acceptable methods" needs to be defined.

Response:

"Environmentally acceptable methods" are those waste disposal technologies, processes and methods which have been arrived at as a result of a good planning process deemed to be acceptable under the Environmental Assessment Act, and which are technically acceptable under the Environmental Protection Act. These methods will be decided upon within an open framework of consultation with all affected parties including the general public.

Further, SWISC is committed to conducting full examinations of alternative methods and proposed sites. Such an examination will incorporate:

- * the full range of benefits and costs; and
- * an approach which minimizes environmental degradation in communities where a facility may be located.

3.0 RESPONSES TO CONCERNS ABOUT PRINCIPLE TWO

To develop a system based on proven technology for processing solid wastes which will eliminate objectionable characteristics associated with some traditional waste management systems and which meets the requirements for approval under the Environment Assessment Act, the Environmental Protection Act and other pertinent statutes.

3.1 Comment:

- * The term "proven technology" needs to be defined.

Response:

With regard to "proven technology", systems and system components will be evaluated to determine their suitability for GTA resources and wastes. Each system component will be assessed on an individual basis, based on its performance record, the ability of the component to be applied to the SWISC's waste management principles; and its considered capability to meet Ontario's legislative requirements.

The judgement on the system or system components capabilities will be based on the opinion of the Technical Committee and SWISC, in accordance with the evaluation criteria set out in the REOI. While there may be a need to apply some subjectivity to the initial opinions, the process is open to public scrutiny. The decision-making process must be reasonable, traceable and able to be replicated.

3.2 Comment:

- * The term "objectionable characteristics" needs to be defined.

Response:

This phrase was included in the principle in recognition of the traditional problems associated with waste disposal facilities. SWISC's goal is to utilize existing policies, guidelines and other standards to assess the potential of a system component to eliminate such objectionable characteristics.

3.3 Comment:

- * The term "residual wastes" needs to be defined.

Response:

"Residual wastes" means wastes remaining for disposal after the resources have been recovered. Diversion programs and technologies must demonstrate their ability to meet or exceed the SWISC targets of 25% by 1992 and 50% diversion of the total solid wastes by the year 2000.

3.4 Comment:

- * There is a need for flexibility of system components to adapt to changes in lifestyle and technologies in the future.

Response:

Principle 3 provides for the need to plan for the future through research, development and implementation of new system components.

In addition, one criterion proposed to evaluate expressions of interest addresses the need for "flexibility with respect to future technological developments", (REOI, p.67).

SWISC proposes an approach which incorporates flexibility -- the development of "a solid waste management system (which) must be environmentally sound, incorporating state-of-the-art technology and a commitment to adapt as technology advances," (emphasis added) (Chairmen's Proposal, p.4).

3.5 Comment:

- * The term "system" needs to be defined.

Response:

The proposed waste management system is described in the REOI (pp 43 and 44) to include:

- . Additions to the Participating Municipalities Diversion Programs which may include components to achieve or exceed the SWISC diversion targets for total solid waste and plans and programs to achieve those targets;
- . Receiving Point(s) for Waste from Participating Municipalities;
- . Receiving Facilities;
- . Transportation to Processing/Disposal Facilities;
- . Processing Facilities;
- . Disposal Facilities; and
- . Research Facilities and Demonstration Projects.

The system must meet the SWISC diversion targets. This is articulated as a mandatory criterion, (REOI, p. 65).

3.6 Comment:

- * The term "other pertinent statutes" needs to be defined.

Response:

The REOI summarizes legislation which may be applicable when applying for approval for a waste management system. It discusses the Environmental Assessment Act, the Environmental Protection Act, the Planning Act as well as makes reference to 12 other laws which may be considered depending upon the specific characteristics and location of the waste management system, (REOI, pp 34-39).

3.7 Comment:

- * "Costs" should be included in this principle.

Response:

Costs are not specifically referenced in this principle. However, costs (social, environmental, technical and financial) are all to be evaluated when preparing the Environmental Assessment.

Principle 6 specifically references financial costs. However, at the current time, systems and system components will be evaluated at the first level screening in the absence of considering the financial costs. Financial costs will be considered in the Request for Proposals evaluation.

The "costs" which will be considered at this stage are primarily the potential environmental and social "costs". A net effects analysis will be conducted on each system component which passes through the mandatory criteria screens.

3.8 Comment:

- * Will private proposals be subject to as rigorous an examination under the Environmental Assessment Act as public sector proposals?

Response:

Yes, but each proposal will not be expected to internally contain an assessment of alternatives. Each proposal received by SWISC will be considered as an "alternative" system or system component. Comparative criteria set out in the REOI will be applied to each proposal which passes through the mandatory screen.

The SWISC evaluation process is as rigorous as that normally applied to the public sector, and will meet the planning process required by the Environmental Assessment Act. While the Environmental Assessment Board has recognized the differences between the private and public sector in the PetroSun-SNC decision, this issue does not apply since SWISC (or the resulting agency) will be a public sector proponent. The successful proposals, private or public, will be subject to the Environmental Assessment Act.

3.9 Comment:

* The term "processing" needs to be defined.

Response:

"Processing" means the total management of all solid wastes generated within the GTA.

4.0 RESPONSES TO CONCERNS ABOUT PRINCIPLE THREE

To construct an innovative framework for new research and development in the area of solid waste reduction, re-use, recycling and recovery.

4.1 Comments:

- * The term "innovative framework" needs to be defined.
- * "Innovative framework" must include action, as well as research.

Response:

SWISC's original thinking was that the R&D efforts would be put in place in the same geographic area as any disposal facilities, to provide industrial development opportunities to a host community. The R&D framework is now contemplated to incorporate investigations into technologies for the use and/or disposal of residual waste. This is indicated on page 44 of the REOI -- "the Research Facility(ies) is required to advance the development of solid waste management as a whole," (emphasis added).

The framework for R&D initiatives will be further investigated and set out for discussion in the next SWISC Status Report. Issues to be considered in developing the framework include:

- . funding;
- . responsibility;
- . a world-wide search for demonstration projects;
- . reduction, re-use and recycling;
- . re-use and disposal technologies for residual wastes;
- . markets for materials and by-products; and
- . marketing of SWISC-generated technologies and methods.

The SWISC waste management system will be designed to accommodate the results of R&D efforts. Suitable projects, technologies or processes can be incorporated into the new waste management system.

4.2 Comment:

- * It is unclear whether "recovery" includes energy recovery (EFW) as well as material recovery. This needs to be defined.

Response:

"Recovery" is defined in the REOI to be "the extraction of materials or energy from waste," (p. 10)

5.0 RESPONSES TO CONCERNS ABOUT PRINCIPLE FOUR

To locate facilities, if possible, in receptive communities and maximize industrial development opportunities for those communities.

5.1 Comments:

- * The term "receptive communities" needs to be defined. It was generally felt that "receptive" should mean acceptable to people living in the community, as opposed to elected officials.
- * The term "community" needs to be defined in a geographic sense, (i.e. whether "community" is the GTA, a Region, a municipality, or a smaller unit.)

Response:

A "receptive community" is defined as one where the level of government responsible for waste disposal formally indicates that it agrees with the proposal in principle, subject to its approval under the Environmental Assessment and Protection Acts.

The concept of plebiscites or referenda have been suggested by the public. These have been utilized in other voluntary siting processes, such as Swan Hills, Alberta. This method of obtaining community input, along with other methods, are currently being reviewed by SWISC. The next stage of the SWISC planning process will indicate options for consideration with regard to the process to be used by municipalities for public consultation.

The Environmental Assessment process supports extensive pre-submission consultation on any proposed undertaking.

Geographically, a "receptive community" includes regional municipalities within the GTA, who will be contemplated as hosts for 4 Rs facilities (Chairmen's Proposal, Appendix A , p ii) -- "State-of-the-Art techniques and technologies for waste reduction and recycling will put in place both in the Regions and at a landfill site".

One option open to SWISC is to manage all of the solid wastes generated within its members regional boundaries. Certainly, waste management

facilities in member Regions are contemplated. The issue of GTA wastes being entirely managed within the boundaries will be addressed when a proposed system is selected for review by the regional governments and the public.

5.2 Comment:

- * The term "maximize development opportunities" should be defined.

Response:

Industrial development opportunities are discussed in the Chairmen's Proposals in Appendix A, p. iii. Facilities "will include a research institute undertaking leading-edge reduction re-use, recycling and recovery research in well-equipped laboratories. They may include state-of-the-art facilities that produce spin-off economic activity." Evaluation criteria for EOI systems and system components expressly contemplates community benefits such as job creation. A criterion will be developed to ensure that any new industrial development in receptive communities is also "acceptable and environmentally sound".

5.3 Comment:

- * It was generally felt that a willing host community is not the most important siting criteria, that protection of human health and the environment, for example, are considered to be more important than finding a receptive host.

Response:

Since the principles are considered priority concepts by SWISC, to be applied as an integrated set of principles, no one takes priority over the other. For the purposes of this document, at this Expressions of Interest stage, criteria need not be prioritized. This will be done, however, at the Request for Proposals stage in accordance with the Environmental Assessment Act process.

The host community is expected to become involved in the operation or monitoring of the proposed facilities, (Chairmen's Proposal, p. iv).

In the event that no acceptable site is found by potential bidders to the RFP (including willing hosts) SWISC will conduct a site search itself, (Chairmen's Proposal, p. iv).

6.0 RESPONSES TO CONCERNS ABOUT PRINCIPLE FIVE

To create a waste management structure that will allow maximum collaborative efforts between municipal, regional, provincial and federal authorities; which best combines the efforts of the public and private sectors; and which serves as a world class model for environmentally sound waste management systems.

6.1 Comment:

- * Many participants felt that the phrase "world class model" be deleted or replaced with a phrase like "state-of-the-art".

Response:

During the public consultation process, much concern was expressed about the term "world class". SWISC recognizes, in hindsight, that the term can be construed to lack meaning, however, the intent was then and is now to create a high quality, state-of-the-art model for managing solid wastes.

6.2 Comment:

- * It was felt that collaboration among the various levels of government is an admirable goal, but one that will be difficult to achieve.

Response:

SWISC views collaboration between all levels of government and the private sector and individuals as essential. The assumption of collective responsibility to deal with the problem of solid waste is paramount in SWISC's proposals. Currently the public and private sector are working effectively together within the GTA in areas such as recycling, transportation, water supply, waste disposal, etc.

6.3 Comment:

- * The issue of accountability of a GTA-wide waste management authority or agency was raised.
- * Concern was expressed about a waste management structure which involves another tier of government.
- * A preference was expressed for a publicly controlled waste management system.

Response:

SWISC recognizes that the public will continue "to hold all elected representatives accountable for collecting, managing and disposing of wastes in an environmentally safe way, with a minimum of inconvenience, risk and nuisance", (Chairmen's Proposal, p. 5). The Chairmen's Proposal goes on to state that "the process (will be) managed in such a way that program costs are in the hands of public authorities..." and that "...it is imperative to set up a structure that is clearly accountable...", (Chairmen's Proposal, p. 5).

In addition, Regional Council decision points are described on page 11 of the Status Report, which indicate full consultation and review by elected Regional Councils of SWISC proposals at each key point in the process. Regional Councils have the final decision regarding whether or not to participate in the preferred system at each key point in the process, (p. 12).

Proposals for joint management of GTA waste are being prepared and will be outlined in the next SWISC Status Report. A special purpose body may be required for budgeting control. The public and Regional governments will be consulted before final decisions are made in this regard.

"From the outset, SWISC has been committed to public control of a long-term waste management system for the GTA. All options on the ownership and operation of such a system are still open. The most appropriate option for ownership and management will be selected when all pertinent information has been obtained, i.e. following receipt of proposals. It is the intent of SWISC to seek a waste management system which protects the public's interests while using the strengths of both the public and private sectors." (Addendum #2 to the REOI, issued November 13, 1989).

7.0 RESPONSES TO CONCERNS ABOUT PRINCIPLE SIX

To provide a cost effective solution to the problem of solid waste management while reducing environmental degradation and the real costs associated with conventional waste management systems.

7.1 Comments:

- * The terms "cost effective" and "real costs" need to be defined.
- * The definition of "real costs" and "cost effective" must include long-term environmental, social and cultural costs.

- * While economics must be considered in the search for a waste management system, most participants felt that the long-term environmental costs are more important.

Response:

This principle will not be applied to the responses to the REOI, (i.e. respondents are not being asked to forward data on costs). The purpose of this principle is to ensure that the financial costs for construction, operation, closure and perpetual care are factored into the comparative evaluations once proposals have been reviewed on the preferred system(s).

Real costs are considered to mean all social, environmental, technical and financial costs associated with a waste management system from cradle to grave. For further clarification on costs, see section 2.7 of this document.

8.0 RESPONSE TO OTHER ISSUES RAISED

Most of the issues raised during the public consultation program have been addressed in previous sections of this document. However, three outstanding issues remain.

8.1 Comment:

- * The relationship between SWISC's search for a waste management system and Regional waste planning initiatives is unclear.

Response:

In their August, 1989 *Status Report*, the Chairmen have set out their working guidelines (Appendix C) which describe the voluntary nature of participating in SWISC in that "nothing is intended to prevent a region ...if it decides to rely exclusively on its own Waste Management Master Plan". At each key decision point during the development of the GTA long-term waste management system, the five Regions will review and/or confirm their continued participation.

8.2 Comment:

- * The newsletter and all SWISC printed material should be printed on paper containing recycled fibres.

Response:

SWISC is committed to the use of paper containing de-inked, post-consumer waste paper for all its printed materials. SWISC has in the past and will in the future continue its practice of using recycled paper.

8.3 Comments:

Although contingency siting issues were not the focus of the Open House/Workshops or the newsletter, a significant number of issues on contingency sites were raised. These include:

- * a fear that hearings under the EPA instead of the EAA will not be sufficient to protect human health and the environment; and
- * a fear that once sited, short-term contingency sites will be used for the long-term.

Response:

SWISC is satisfied on the advice of the Ontario Ministry of the Environment that hearings held under the Environmental Protection Act will be sufficient to protect human health and the environment.

It is the intention of SWISC that the long-term waste management system for the GTA be in place by 1996 at the latest. While contingency sites are nominated for SWISC's acceptance, it is the responsibility of the Regions to gain approval for these sites under the Environmental Protection Act. It is not intended that these sites be used after 1996.

Comments:

Additional issues around contingency sites include:

- * environmental and social concerns about specific sites which may be proposed as contingency sites; and
- * equity issues around the exporting of waste from one Region within the GTA to another.

Response:

SWISC will be forwarding these concerns to the Chairmen of the five Regions in the Greater Toronto Area.